

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA

 **FILED**

AUG 5 2020

U.S. DISTRICT COURT-WVND
WHEELING, WV 26003

UNITED STATES OF AMERICA,

v.

JENNIFER MARIE CUFFMAN,
aka "JENNIFER PROCTOR" aka "JEN,"
DOMINIQUE REVELL DUNGEY,
aka "MURDA,"
TYRONE MAJETTE, aka "RULLO"
aka "MARLO" aka "BOO MAN,"
CARLOS LEEPER, aka "LOS,"
MILIK ISIAH STANLEY, aka "TACO,"
DENICO ANDERSON, aka "TONE,"
BROOKELYN MYERS, aka "BROOKE,"
ANDRE CORNELL DIGGS,
aka "DRE" aka "BIG HOMIE,"
DEONTRE CHRISTIAN JOHNSON,
aka "DAY DAY,"
JALEN DESHON DALTON,
aka "J" aka "NBA J,"
SUSAN MANUEL,
SIHRAHN MAJOR, II, aka "BLACK,"
QUAISON MAURICE HARRIS, aka "ACTION,"
ZACHARY JAMES PARSONS,
MICHAEL MONTREAL MOON, aka "MEEZY,"
ERICK LAMONT STANBACK SINGLETON,
aka "GOTTI,"
SHUNTAZE HARVEY,
ANTONIO MARIO HALL,
MATTHEW TRABERT,
EIANDEUS KILAND REBRAUN PIQUE, aka
"DUKE,"
ASHLY PHILLIPS,
DAMION JONTAZ PIPPENS,
aka "DOLLA" aka "DJ,"
WILLIE JOHNSON, aka "ACE,"
KRISTEN HOFFLER,
JOSEPH GARTH, JR., aka "NEPHEW,"
LARRY A. CUFFMAN, aka "POPS,"

Defendants.

Criminal No. 5:20 cr 16

Violations: 18 U.S.C. § 2
21 U.S.C. § 841(a)(1)
21 U.S.C. § 841(b)(1)(B)(viii)
21 U.S.C. § 841(b)(1)(C)
21 U.S.C. § 846
21 U.S.C. § 856(a)(2)
21 U.S.C. § 860

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(Conspiracy to Distribute and Possess with the Intent to Distribute
Cocaine Base, Methamphetamine, Heroin, and Fentanyl)

During a period commencing in or about February 2019, and ending on or about the date of the Indictment, in Ohio County, within the Northern District of West Virginia, and elsewhere, defendants **JENNIFER MARIE CUFFMAN** aka “**JENNIFER PROCTOR**” aka “**JEN**,” **DOMINIQUE REVELL DUNGEY** aka “**MURDA**,” **TYRONE MAJETTE** aka “**RULLO**” aka “**MARLO**” aka “**BOO MAN**,” **CARLOS LEEPER** aka “**LOS**,” **MILIK ISIAH STANLEY** aka “**TACO**,” **DENICO ANDERSON** aka “**TONE**,” **BROOKELYN MYERS** aka “**BROOKE**,” **ANDRE CORNELL DIGGS** aka “**DRE**” aka “**BIG HOMIE**,” **DEONTRE CHRISTIAN JOHNSON** aka “**DAY DAY**,” **JALEN DESHON DALTON** aka “**J**” aka “**NBA J**,” **SUSAN MANUEL**, **SIHRAHN MAJOR, II** aka “**BLACK**,” **QUAISON MAURICE HARRIS** aka “**ACTION**,” **ZACHARY JAMES PARSONS**, **MICHAEL MONTREAL MOON** aka “**MEEZY**,” **ERICK LAMONT STANBACK SINGLETON** aka “**GOTTI**,” **SHUNTAZE HARVEY**, **ANTONIO MARIO HALL**, **MATTHEW TRABERT**, **EIANDREUS KILAND REBRAUN PIQUE** aka “**DUKE**,” **ASHLY PHILLIPS**, **DAMION JONTAZ PIPPENS** aka “**DOLLA**” aka “**DJ**,” **WILLIE JOHNSON** aka “**ACE**,” **KRISTEN HOFFLER**, **JOSEPH GARTH, JR.** aka “**NEPHEW**,” and **LARRY A. CUFFMAN** aka “**POPS**,” and others known and unknown to the Grand Jury, did unlawfully, knowingly and intentionally combine, conspire, confederate, agree and have a tacit understanding to violate Title 21, United States Code, Section 841(a)(1). It was a purpose and object of the conspiracy to possess with intent to distribute and distribute a mixture and substance containing a detectable amount of cocaine base, also known as “crack,” a Schedule II controlled substance, methamphetamine, including “ice,” Schedule II controlled

substances, heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance;
in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(C).

COUNT TWO

(Distribution of Cocaine Base)

On or about May 13, 2019, in Ohio County, in the Northern District of West Virginia, defendant **DOMINIQUE REVELL DUNGEY aka "MURDA,"** did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of cocaine base, also known as "crack," a Schedule II controlled substance, in exchange for \$60.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THREE

(Distribution of 5 Grams or More of Methamphetamine)

On or about July 23, 2019, in Ohio County, in the Northern District of West Virginia, defendant **TYRONE MAJETTE aka "RULLO" aka "MARLO" aka "BOO MAN,"** did unlawfully, knowingly, intentionally, and without authority, distribute five (5) grams or more of methamphetamine, also known as "ice," a Schedule II controlled substance, in exchange for \$800.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii).

COUNT FOUR

(Distribution of Heroin)

On or about July 23, 2019, in Ohio County, in the Northern District of West Virginia, defendant **TYRONE MAJETTE aka "RULLO" aka "MARLO" aka "BOO MAN,"** did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in exchange for \$300.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FIVE

(Distribution of Cocaine Base)

On or about August 15, 2019, in Ohio County, in the Northern District of West Virginia, defendant **CARLOS LEEPER aka “LOS,”** did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of cocaine base, also known as “crack,” a Schedule II controlled substance, in exchange for \$100.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SIX

(Distribution of Cocaine Base)

On or about August 19, 2019, in Ohio County, in the Northern District of West Virginia, defendant **MILIK ISIAH STANLEY aka “TACO,”** did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of cocaine base, also known as “crack,” a Schedule II controlled substance, in exchange for \$50.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SEVEN

(Distribution of Methamphetamine)

On or about August 19, 2019, in Ohio County, in the Northern District of West Virginia, defendant **MILIK ISIAH STANLEY aka "TACO,"** did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in exchange for \$100.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT EIGHT

(Distribution of Cocaine Base within 1000 feet of a Protected Location)

On or about August 30, 2019, in Ohio County, in the Northern District of West Virginia, defendant **MILIK ISIAH STANLEY aka "TACO,"** did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of cocaine base, also known as "crack," a Schedule II controlled substance, in exchange for \$50.00 in United States currency within 1,000 feet of real property comprising the Bridge Park Playground; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860.

COUNT NINE

(Distribution of Methamphetamine within 1000 feet of a Protected Location)

On or about September 3, 2019, in Ohio County, in the Northern District of West Virginia, defendant **MILIK ISIAH STANLEY aka “TACO,”** did unlawfully, knowingly, intentionally, and without authority, distribute methamphetamine, also known as “ice,” a Schedule II controlled substance, in exchange for \$100.00 in United States currency within 1,000 feet of real property comprising the Bridge Park Playground; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860.

COUNT TEN

(Distribution of Methamphetamine)

On or about September 11, 2019, in Ohio County, in the Northern District of West Virginia, defendant **DENICO ANDERSON aka “TONE,”** did unlawfully, knowingly, intentionally, and without authority, distribute methamphetamine, also known as “ice,” a Schedule II controlled substance, in exchange for \$100.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT ELEVEN

(Distribution of Heroin and Fentanyl)

On or about December 5, 2019, in Ohio County, in the Northern District of West Virginia, defendant **BROOKELYN MYERS** aka “**BROOKE**,” did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, in exchange for \$40.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWELVE

(Distribution of Heroin within 1000 feet of a Protected Location)

On or about December 5, 2019, in Ohio County, in the Northern District of West Virginia, defendant **ANDRE CORNELL DIGGS** aka “DRE” aka “BIG HOMIE,” did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in exchange for \$40.00 in United States currency within 1,000 feet of real property comprising the North Park Apartments, a housing facility owned by a public housing authority; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860.

COUNT THIRTEEN

(Distribution of Heroin and Fentanyl within 1000 feet of a Protected Location)

On or about December 6, 2019, in Ohio County, in the Northern District of West Virginia, defendant **ANDRE CORNELL DIGGS** aka “DRE” aka “BIG HOMIE,” did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, in exchange for \$40.00 in United States currency within 1,000 feet of real property comprising the Riverview Towers, a housing facility owned by a public housing authority; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860.

COUNT FOURTEEN

(Distribution of Cocaine Base within 1000 feet of a Protected Location)

On or about December 16, 2019, in Ohio County, in the Northern District of West Virginia, defendant **DEONTRE CHRISTIAN JOHNSON aka “DAY DAY,”** did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of cocaine base, also known as “crack,” a Schedule II controlled substance, in exchange for \$50.00 in United States currency within 1,000 feet of real property comprising the Jensen Playground; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860.

COUNT FIFTEEN

(Aiding and Abetting the Distribution of Cocaine Base)

On or about December 18, 2019, in Ohio County, in the Northern District of West Virginia, defendants **DOMINIQUE REVELL DUNGEY** aka “**MURDA,**” and **CARLOS LEEPER** aka “**LOS,**” aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of cocaine base, also known as “crack,” a Schedule II controlled substance, in exchange for \$30.00 in United States currency; in violation of Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SIXTEEN

(Distribution of Cocaine Base within 1000 feet of a Protected Location)

On or about December 27, 2019, in Ohio County, in the Northern District of West Virginia, defendant **JALEN DESHON DALTON aka “J” aka “NBA J,”** did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of cocaine base, also known as “crack,” a Schedule II controlled substance, in exchange for \$40.00 in United States currency within 1,000 feet of real property comprising the Madison Elementary School; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860.

COUNT SEVENTEEN

(Aiding and Abetting the Distribution of 5 Grams or More of Methamphetamine
within 1000 feet of a Protected Location)

On or about January 2, 2020, in Ohio County, in the Northern District of West Virginia, defendants **SUSAN MANUEL and SIHRAHN MAJOR, II, aka "BLACK,"** aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority, distribute five (5) grams or more of methamphetamine, also known as "ice," a Schedule II controlled substance, in exchange for \$160.00 in United States currency within 1,000 feet of real property comprising the Madison Elementary School; in violation of Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii), and 860.

COUNT EIGHTEEN

(Distribution of 5 Grams or More of Methamphetamine within 1000 feet of a Protected Location)

On or about January 3, 2020, in Ohio County, in the Northern District of West Virginia, defendant **SIHRAHN MAJOR, II, aka "BLACK,"** did unlawfully, knowingly, intentionally, and without authority, distribute five (5) grams or more of methamphetamine, also known as "ice," a Schedule II controlled substance, in exchange for \$160.00 in United States currency within 1,000 feet of real property comprising the Madison Elementary School; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii), and 860.

COUNT NINETEEN

(Distribution of Heroin and Fentanyl)

On or about January 3, 2020, in Ohio County, in the Northern District of West Virginia, defendant **QUAISON MAURICE HARRIS aka "ACTION,"** did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, in exchange for \$40.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY

(Aiding and Abetting the Distribution of Cocaine Base)

On or about January 6, 2020, in Ohio County, in the Northern District of West Virginia, defendants **ZACHARY JAMES PARSONS and QUAISON MAURICE HARRIS aka “ACTION,”** aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of cocaine base, also known as “crack,” a Schedule II controlled substance, in exchange for \$40.00 in United States currency; in violation of Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-ONE

(Distribution of Cocaine Base within 1000 feet of a Protected Location)

On or about January 7, 2020, in Ohio County, in the Northern District of West Virginia, defendant **QUAISON MAURICE HARRIS aka "ACTION,"** did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of cocaine base, also known as "crack," a Schedule II controlled substance, in exchange for \$40.00 in United States currency within 1,000 feet of real property comprising the Belle Isle Playground; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860.

COUNT TWENTY-TWO

(Distribution of 5 Grams or More of Methamphetamine within 1000 feet of a Protected Location)

On or about January 7, 2020, in Ohio County, in the Northern District of West Virginia, defendant **SIHRAHN MAJOR, II, aka "BLACK,"** did unlawfully, knowingly, intentionally, and without authority, distribute five (5) grams or more of methamphetamine, a Schedule II controlled substance, in exchange for \$160.00 in United States currency within 1,000 feet of real property comprising the Riverview Towers, a housing facility owned by a public housing authority; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii), and 860.

COUNT TWENTY-THREE

(Aiding and Abetting the Distribution of Cocaine Base within 1000 feet of a Protected Location)

On or about January 20, 2020, in Ohio County, in the Northern District of West Virginia, defendants **MICHAEL MONTREAL MOON** aka “**MEEZY**” and **ERICK LAMONT STANBACK SINGLETON** aka “**GOTTI**,” aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of cocaine base, also known as “crack,” a Schedule II controlled substance, in exchange for \$40.00 in United States currency within 1,000 feet of real property comprising the Madison Elementary School; in violation of Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860.

COUNT TWENTY-FOUR

(Aiding and Abetting the Distribution of Cocaine Base within 1000 feet of a Protected Location)

On or about January 21, 2020, in Ohio County, in the Northern District of West Virginia, defendants **MICHAEL MONTREAL MOON** aka “**MEEZY**” and **ERICK LAMONT STANBACK SINGLETON** aka “**GOTTI**,” aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of cocaine base, also known as “crack,” a Schedule II controlled substance, in exchange for \$40.00 in United States currency within 1,000 feet of real property comprising the Jensen Playground; in violation of Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860.

COUNT TWENTY-FIVE

(Aiding and Abetting the Distribution of Cocaine Base within 1000 feet of a Protected Location)

On or about January 22, 2020, in Ohio County, in the Northern District of West Virginia, defendants **SHUNTAZE HARVEY and TYRONE MAJETTE aka “RULLO” aka “MARLO” aka “BOO MAN,”** aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of cocaine base, also known as “crack,” a Schedule II controlled substance, in exchange for \$40.00 in United States currency within 1,000 feet of real property comprising the West Virginia Northern Community College; in violation of Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860.

COUNT TWENTY-SIX

(Distribution of Cocaine Base within 1000 feet of a Protected Location)

On or about January 22, 2020, in Ohio County, in the Northern District of West Virginia, defendant **MICHAEL MONTREAL MOON aka “MEEZY,”** did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of cocaine base, also known as “crack,” a Schedule II controlled substance, in exchange for \$50.00 in United States currency within 1,000 feet of real property comprising the Madison Elementary School; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860.

COUNT TWENTY-SEVEN

(Possession with Intent to Distribute Heroin)

On or about January 23, 2020, in Ohio County, in the Northern District of West Virginia, defendant **MICHAEL MONTREAL MOON aka "MEEZY,"** did unlawfully, knowingly, intentionally, and without authority, possess with the intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-EIGHT

(Possession with Intent to Distribute Cocaine Base)

On or about January 23, 2020, in Ohio County, in the Northern District of West Virginia, defendant **MICHAEL MONTREAL MOON aka "MEEZY,"** did unlawfully, knowingly, intentionally, and without authority, possess with the intent to distribute a mixture and substance containing a detectable amount of cocaine base, also known as "crack," a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-NINE

(Distribution Methamphetamine within 1000 feet of a Protected Location)

On or about January 23, 2020, in Ohio County, in the Northern District of West Virginia, defendant **MILIK ISIAH STANLEY aka "TACO,"** did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in exchange for \$300.00 in United States currency within 1,000 feet of real property comprising the Madison Elementary School; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860.

COUNT THIRTY

(Aiding and Abetting the Distribution of Cocaine Base)

On or about January 30, 2020, in Ohio County, in the Northern District of West Virginia, defendants **ANTONIO MARIO HALL and TYRONE MAJETTE aka “RULLO” aka “MARLO” aka “BOO MAN,”** aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of cocaine base, also known as “crack,” a Schedule II controlled substance, in exchange for \$40.00 in United States currency; in violation of Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THIRTY-ONE

(Aiding and Abetting the Distribution of Cocaine Base within 1000 feet of a Protected Location)

On or about February 6, 2020, in Ohio County, in the Northern District of West Virginia, defendants **SHUNTAZE HARVEY and TYRONE MAJETTE aka “RULLO” aka “MARLO” aka “BOO MAN,”** aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of cocaine base, also known as “crack,” a Schedule II controlled substance, in exchange for \$40.00 in United States currency within 1,000 feet of real property comprising the Elks Playground; in violation of Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860.

COUNT THIRTY-TWO

(Aiding and Abetting the Distribution of Cocaine Base within 1000 feet of a Protected Location)

On or about February 11, 2020, in Ohio County, in the Northern District of West Virginia, defendants **SHUNTAZE HARVEY and TYRONE MAJETTE aka “RULLO” aka “MARLO” aka “BOO MAN,”** aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of cocaine base, also known as “crack,” a Schedule II controlled substance, in exchange for \$60.00 in United States currency within 1,000 feet of real property comprising the Wheeling Catholic Central High School; in violation of Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860.

COUNT THIRTY-THREE

(Aiding and Abetting the Distribution of Heroin within 1000 feet of a Protected Location)

On or about February 12, 2020, in Ohio County, in the Northern District of West Virginia, defendants **MATTHEW TRABERT and EIANDEUS KILAND REBRAUN PIQUE aka “DUKE,”** aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in exchange for \$40.00 in United States currency within 1,000 feet of real property comprising the Wheeling University; in violation of Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860.

COUNT THIRTY-FOUR

(Aiding and Abetting the Distribution of Methamphetamine within 1000 feet of a Protected Location)

On or about February 14, 2020, in Ohio County, in the Northern District of West Virginia, defendants **MICHAEL MONTREAL MOON aka “MEEZY” and ERICK LAMONT STANBACK SINGLETON aka “GOTTI,”** aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in exchange for \$50.00 in United States currency within 1,000 feet of real property comprising the Madison Elementary School; in violation of Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860.

COUNT THIRTY-FIVE

(Aiding and Abetting the Distribution of Heroin within 1000 feet of a Protected Location)

On or about February 15, 2020, in Ohio County, in the Northern District of West Virginia, defendants **MATTHEW TRABERT and EIANDEUS KILAND REBRAUN PIQUE aka “DUKE,”** aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in exchange for \$30.00 in United States currency within 1,000 feet of real property comprising the Wheeling University; in violation of Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860.

COUNT THIRTY-SIX

(Aiding and Abetting the Distribution of Cocaine Base within 1000 feet of a Protected Location)

On or about February 15, 2020, in Ohio County, in the Northern District of West Virginia, defendants **MATTHEW TRABERT and EIANDEUS KILAND REBRAUN PIQUE aka “DUKE,”** aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of cocaine base, also known as “crack,” a Schedule II controlled substance, in exchange for \$30.00 in United States currency within 1,000 feet of real property comprising the Wheeling University; in violation of Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860.

COUNT THIRTY-SEVEN

(Distribution of Heroin within 1000 feet of a Protected Location)

On or about February 15, 2020, in Ohio County, in the Northern District of West Virginia, defendant **ERICK LAMONT STANBACK SINGLETON aka “GOTTI,”** did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in exchange for \$30.00 in United States currency within 1,000 feet of real property comprising the Madison Elementary School; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860.

COUNT THIRTY-EIGHT

(Distribution of Methamphetamine within 1000 feet of a Protected Location)

On or about February 15, 2020, in Ohio County, in the Northern District of West Virginia, defendant **ERICK LAMONT STANBACK SINGLETON aka “GOTTI,”** did unlawfully, knowingly, intentionally, and without authority, distribute methamphetamine, also known as “ice,” a Schedule II controlled substance, in exchange for \$30.00 in United States currency within 1,000 feet of real property comprising the Madison Elementary School; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860.

COUNT THIRTY-NINE

(Aiding and Abetting the Distribution of Heroin within 1000 feet of a Protected Location)

On or about February 24, 2020, in Ohio County, in the Northern District of West Virginia, defendants **ASHLY PHILLIPS and DAMION JONTAZ PIPPENS aka “DOLLA” aka “DJ,”** aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in exchange for \$50.00 in United States currency within 1,000 feet of real property comprising the Luau Manor, a housing facility owned by a public housing authority; in violation of Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860.

COUNT FORTY

(Distribution of Cocaine Base within 1000 feet of a Protected Location)

On or about February 26, 2020, in Ohio County, in the Northern District of West Virginia, defendant **QUAISON MAURICE HARRIS** aka “**ACTION**,” did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of cocaine base, also known as “crack,” a Schedule II controlled substance, in exchange for \$50.00 in United States currency within 1,000 feet of real property comprising the Belle Isle Playground; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860.

COUNT FORTY-ONE

(Aiding and Abetting the Distribution of Cocaine Base within 1000 feet of a Protected Location)

On or about February 27, 2020, in Ohio County, in the Northern District of West Virginia, defendants **ASHLY PHILLIPS and DAMION JONTAZ PIPPENS aka “DOLLA” aka “DJ,”** aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of cocaine base, also known as “crack,” a Schedule II controlled substance, in exchange for \$40.00 in United States currency within 1,000 feet of real property comprising the Luau Manor, a housing facility owned by a public housing authority; in violation of Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860.

COUNT FORTY-TWO

(Aiding and Abetting Possession with Intent to Distribute Heroin
within 1000 feet of a Protected Location)

On or about March 12, 2020, in Ohio County, in the Northern District of West Virginia, defendants **MATTHEW TRABERT and EIANDEUS KILAND REBRAUN PIQUE aka “DUKE,”** aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority, possess with the intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of real property comprising the Wheeling University; in violation of Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860.

COUNT FORTY-THREE

(Aiding and Abetting Possession with Intent to Distribute Cocaine Base
within 1000 feet of a Protected Location)

On or about March 12, 2020, in Ohio County, in the Northern District of West Virginia, defendant **MATTHEW TRABERT and EIANDEUS KILAND REBRAUN PIQUE aka “DUKE,”** aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority, possess with the intent to distribute a mixture and substance containing a detectable amount of cocaine base, also known as “crack,” a Schedule II controlled substance, within 1,000 feet of real property comprising the Wheeling University; in violation of Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860.

COUNT FORTY-FOUR

(Distribution of Cocaine Base)

On or about April 1, 2020, in Ohio County, in the Northern District of West Virginia, defendant **EIANDREUS KILAND REBRAUN PIQUE aka “DUKE,”** did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of cocaine base, also known as “crack,” a Schedule II controlled substance, in exchange for \$200.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FORTY-FIVE

(Aiding and Abetting Possession with Intent to Distribute Heroin
within 1000 feet of a Protected Location)

On or about April 23, 2020, in Ohio County, in the Northern District of West Virginia, defendants **KRISTEN HOFFLER, WILLIE JOHNSON aka “ACE,” and DAMION DONTAZ PIPPENS aka “DOLLA” aka “DJ,”** aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority, possess with the intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of real property comprising the Luau Manor, a housing facility owned by a public housing authority; in violation of Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860.

COUNT FORTY-SIX

(Aiding and Abetting Possession with Intent to Distribute Cocaine Base
within 1000 Feet of a Protected Location)

On or about April 23, 2020, in Ohio County, in the Northern District of West Virginia, defendants **KRISTEN HOFFLER, WILLIE JOHNSON aka “ACE,” and DAMION DONTAZ PIPPENS aka “DOLLA” aka “DJ,”** aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority, possess with the intent to distribute a mixture and substance containing a detectable amount of cocaine base, also known as “crack,” a Schedule II controlled substance, within 1,000 feet of real property comprising the Luau Manor, a housing facility owned by a public housing authority; in violation of Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860.

COUNT FORTY-SEVEN

(Distribution of Heroin within 1000 feet of a Protected Location)

On or about May 7, 2020, in Ohio County, in the Northern District of West Virginia, defendant **TYRONE MAJETTE** aka **“RULLO”** aka **“MARLO”** aka **“BOO MAN,”** did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in exchange for \$1,500.00 in United States currency within 1,000 feet of real property comprising the Madison Elementary School; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860.

COUNT FORTY-EIGHT

(Aiding and Abetting the Distribution of Cocaine Base)

On or about June 8, 2020, in Ohio County, in the Northern District of West Virginia, defendants **JOSEPH GARTH, JR. aka “NEPHEW” and LARRY A. CUFFMAN aka “POPS,”** aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of cocaine base, also known as “crack,” a Schedule II controlled substance, in exchange for \$50.00 in United States currency; in violation of Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FORTY-NINE

(Maintaining Drug-Involved Premises within 1000 Feet of a Protected Location)

During the period commencing on or about May 2019, an exact date being unknown, and continuing through the date of this Indictment, in Ohio County, in the Northern District of West Virginia, defendant **CARLOS LEEPER aka “LOS,”** managed and controlled a place located at South York Street in Wheeling, West Virginia, as an owner and occupant, and did knowingly and intentionally profit from and make available for use said place for the purpose of unlawfully storing and distributing controlled substances, that is heroin, a Schedule I controlled substance, methamphetamine, a Schedule II controlled substance, and cocaine base, also known as “crack,” a Schedule II controlled substance, within 1,000 feet of real property comprising the Jensen Playground; in violation of Title 21, United States Code, Sections 856(a)(2) and 860.

COUNT FIFTY

(Maintaining Drug-Involved Premises within 1000 Feet of a Protected Location)

During the period commencing on or about September 2019, an exact date being unknown, to on or about April 23, 2020, in Ohio County, in the Northern District of West Virginia, defendant **KRISTEN HOFFLER** managed and controlled a place located at Market Street in Wheeling, West Virginia, as a lessee and occupant, and did knowingly and intentionally rent, lease, profit from, and make available for use said place for the purpose of unlawfully storing and distributing controlled substances, that is heroin, a Schedule I controlled substance, and cocaine base, also known as “crack,” a Schedule II controlled substance, within 1,000 feet of real property comprising the Luau Manor, a housing facility owned by a public housing authority; in violation of Title 21, United States Code, Sections 856(a)(2) and 860.

FORFEITURE ALLEGATION

Controlled Substance Act

Pursuant to Title 21, United States Code, Section 853, and Title 21, United States Code, Section 841, the government will seek the forfeiture of property as part of the sentence imposed in this case; that is, the forfeiture of any property used, or intended to be used, to commit or to facilitate the commission of the above referenced offense, and any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of such offense, including the following:

1. \$1,015.00 in United States currency seized from MICHAEL MONTREAL MOON aka “MEEZY” on January 23, 2020;
2. \$2,325.00 in United States currency seized during the execution of a search warrant at the residence of MATTHEW TRABERT on March 12, 2020;
3. \$10,000.00 in United States currency seized from the vehicle of DAMION DONTAZ PIPPENS aka “DOLLA” aka “DJ” on April 23, 2020;
4. \$1,975.00 in United States currency seized from DAMION DONTAZ PIPPENS aka “DOLLA” aka “DJ” on April 23, 2020;
5. \$3,000.00 in United States currency seized during the execution of a search warrant at the residence of KRISTEN HOFFLER on April 23, 2020;
6. Tanfogli pistol, imported by E.A.A., model Witness P S, 9mm caliber, serial number MT16755, seized during the execution of a search warrant at the residence of KRISTEN HOFFLER on April 23, 2020;
7. Smith & Wesson pistol, model SW9VE, 9mm caliber, serial number DVB7555, and accompanying five rounds of Remington 9mm caliber ammunition, seized during the execution of a search warrant at the residence of ASHLY PHILLIPS on April 23, 2020;
8. Smith & Wesson pistol, model unknown, .22 caliber, no serial number, seized during the execution of a search warrant at the residence of ASHLY PHILLIPS on April 23, 2020;

9. Colt pistol, model unknown, .25 caliber, serial number OD66176, seized during the execution of a search warrant at the residence of ASHLY PHILLIPS on April 23, 2020;
and
10. \$3,144.00 in United States currency seized during the execution of a search warrant on May 24, 2020.

A True Bill,

/s/
Grand Jury Foreperson

/s/
WILLIAM J. POWELL
United States Attorney

Shawn M. Adkins
Assistant United States Attorney

Clayton J. Reid
Assistant United States Attorney